

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

AFFIRMATION IN SUPPORT
OF ORDER OF CONTINUANCE

NASIM MAHUMED, :

TANVEER A. CHAUDHRY, :

EDNA PAGUD, and :

PARVEZ MUNSHI, :

14 Mag. 0029

Defendants.

- - - - - X

STATE OF NEW YORK)

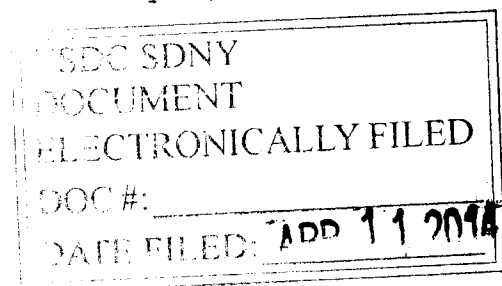
COUNTY OF NEW YORK : ss.:

SOUTHERN DISTRICT OF NEW YORK)

Edward B. Diskant, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office of Preet Bharara, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which an indictment or information would otherwise have to be filed, pursuant to Title 18, United States Code, Section 3161(h)(7)(A).

2. The defendants were arrested on January 9, 2014, and were charged with a violation of Title 18, United States Code, Section 1349, in a complaint dated January 8, 2014.



3. The defendants were presented before Magistrate Judge Sarah Netburn on January 9, 2014, at which time defendant Nasim Mahumed was detained, and defendants Tavneer A. Chaudhry, Edna Pagud, and Parvez Munshi were later released on bail.

4. At the initial presentment on January 9, 2014, defense counsel for each defendant consented to a waiver of his client's right pursuant to Rule 5 of the Federal Rules of Criminal Procedure to a preliminary hearing within 14 or 21 days of the initial appearance. Accordingly, under the Speedy Trial Act the Government initially has until February 10, 2014 within which to file an indictment or information. On or about February 10, 2014, the Hon. Andrew J. Peck granted the Government's application to extend the time in which to file an indictment or information by 30 days. On or about March 12, 2014, the Hon. James C. Francis granted the Government's application to extend the time in which to file an indictment or information by 30 days. Accordingly, the Government had until April 11, 2014 to file an indictment or information.

5. Since the presentment, counsel for each defendant and I have had discussions regarding a possible disposition of this case. The negotiations have not been completed, and we plan to continue our discussions but do not anticipate a

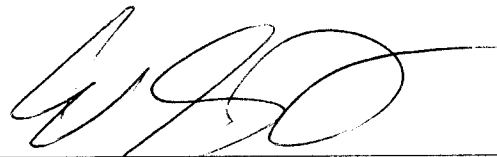
resolution before the deadline under the Speedy Trial Act expires on April 11, 2014.

6. Therefore, the Government is requesting a 30-day continuance until May ¹²~~11~~, 2014, to continue the foregoing discussions and attempt to reach a disposition of this matter. Between April 1-4, 2014, I conferred separately with counsel for each defendant, and each consented to this request for a continuance. This request has also been approved by Andrew Dember, Deputy Chief of the Criminal Division.

7. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

I declare under penalties of perjury that the foregoing is true and correct, pursuant to 28 U.S.C. § 1746.

Dated: New York, New York
April 11, 2014



EDWARD B. DISKANT
Assistant United States Attorney
Southern District of New York
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